

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the matter of the failure of Haas)	Docket No. 24-CONS-3006-CPEN
Petroleum, LLC (Operator) to comply with)	
K.A.R. 82-3-120.)	CONSERVATION DIVISION
)	
_____)	License No. 33640

PRE-FILED TESTIMONY OF

KRAIG STOLL

ON BEHALF OF COMMISSION STAFF

APRIL 5, 2024

1 **Q. What is your name and business address?**

2 A. Kraig Stoll, 266 N. Main St., Suite 220, Wichita, KS 67202

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by the Conservation Division of the Kansas Corporation Commission (KCC)
5 as the supervisor of the Environmental Protection and Remediation Department.

6 **Q. Would you please briefly describe your background and work experience?**

7 A. I have a Bachelor of Science degree from the University of Kansas. After receiving my degree,
8 I worked as a Geology Assistant for the Kansas Geological Survey from 2011 to 2012. In July
9 2012, I began working at the KCC as an environmental scientist. After working in that role
10 for almost 10 years, I was promoted to supervisor of the Environmental Protection and
11 Remediation Department in April of 2022. As the supervisor of the Environmental Protection
12 and Remediation Department, my primary duties include processing and reviewing well
13 inventory certifications, overseeing the change of operator process, processing and reviewing
14 environmental assessment requests, and processing open records requests.

15 **Q. Have you previously testified before the Commission?**

16 A. No.

17 **Q. What is the purpose of your testimony in this matter?**

18 A. The purpose of my testimony is to discuss Request for Change of Operator (T-1) forms that
19 have been submitted to transfer leases from Haas Petroleum, LLC (Haas) to other operators.

20 **Q. What is a T-1 form?**

21 A. A T-1 form is a notification that operators submit to Commission Staff in order to request that
22 Commission Staff change the operator who is responsible for the wells on a particular lease.

1 Under K.A.R. 82-3-136, operators are required to report any change in operator responsibility
2 within 30 days for Commission Staff's review.

3 **Q. How does the T-1 form process generally work?**

4 A. Generally, the T-1 form is created and filled out by a KOLAR representative of the prior
5 operator. Once the T-1 form is filled out the prior operator will electronically sign the form
6 and send it to the new operator. Then the new operator is able to review the form and
7 electronically sign and submit the form to Commission Staff for review. Commission Staff
8 then reviews the T-1 form to ensure all of the information is filled out correctly and that there
9 is sufficient legal documentation attached to the T-1 form. If Commission Staff discovers any
10 issues, then it is common to work with Legal Staff regarding the T-1 forms that are submitted.

11 **Q. Has Operator transferred wells from its license?**

12 A. Yes. Staff has approved 14 T-1 forms after the deadline referenced in Ms. Nancy Borst's
13 testimony. As of the date of this testimony, there are two T-1 forms pending. These T-1 forms
14 request to transfer leases from Haas to Jack W. McFadden dba McFadden Oil Co. and were
15 just submitted on March 27, 2024. My department is working with Legal Staff to ensure
16 everything on the forms appears to be correct. In total, Commission Staff has processed more
17 than 35 T-1 forms transferring wells from Haas' license to other operators' licenses since
18 Haas' application for license renewal was denied by the Commission on November 22, 2022.

19 **Q. Are there still unplugged wells on Operator's license?**

20 A. Yes. There are still approximately 120 wells remaining on Operator's license as of the date of
21 this testimony. This number excludes the wells that are currently pending on T-1 forms.

22 **Q. Does this conclude your testimony?**

23 A. Yes.

CERTIFICATE OF SERVICE

24-CONS-3006-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Testimony of Kraig Stoll has been served to the following by means of electronic service on April 5, 2024.

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